

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PHARMACIA CORPORATION)	
N/K/A PFIZER INC.,)	
)	
Plaintiff,)	C.A. No. 2:18-cv-00510-ES-MAH
)	
v.)	
)	RETURN DATE: AUGUST 5, 2019
ARCH SPECIALTY INSURANCE)	
COMPANY and TWIN CITY FIRE)	ORAL ARGUMENT REQUESTED
INSURANCE COMPANY,)	
)	
Defendants.)	
)	

**NOTICE OF MOTION FOR SUMMARY JUDGMENT
ON BEHALF OF DEFENDANTS**

TO: Robin Cohen, Esq.
Adam Ziffer (pro hac vice)
Marc T. Ladd (pro hac vice)
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PLEASE TAKE NOTICE that the undersigned attorneys for Defendants ARCH SPECIALTY INSURANCE COMPANY and TWIN CITY FIRE INSURANCE COMPANY (together, “Insurers”) shall apply to the Honorable Esther Salas, United States District Court Judge for the United States District Court, District of New Jersey, at the Federal Courthouse in Trenton, New Jersey, on August 5, at 9:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, for an Order granting summary judgment in favor of Insurers, entering judgment in favor of Insurers, and dismissing Plaintiff’s Complaint against Insurers, with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of their Motion for Summary Judgment, Insurers will rely on the Accompanying Statement of Undisputed Material Facts, Memorandum of Law and Declaration of Gabriela Richeimer, Esq. with exhibits.

A proposed Order is submitted separately.

Respectfully submitted,

Dated: June 28, 2019

WHITE AND WILLIAMS LLP

/s/Erica Kerstein
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